UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF LOUISIANA

THE STATE OF LOUISIANA

VERSUS

SANOFI-AVENTIS U.S. LLC, ET AL.

CIVIL ACTION

NO. 3:23-cv-00302-BAJ-SDJ

JUDGE: BRIAN A. JACKSON

MAGISTRATE JUDGE: SCOTT D. JOHNSON

SECOND CONSENT MOTION FOR EXTENSION OF TIME TO PLEAD

NOW COMES Defendant Sanofi-Aventis U.S. LLC ("Sanofi") which, pursuant to Local Civil Rule 7 of the Local Rules of the United States District Court for the Middle District of Louisiana, hereby requests an Order granting all Defendants an extension for a period of fourteen (14) days from the date on which the Court issues a ruling on the forthcoming motion to remand to be filed by the Plaintiff, the State of Louisiana ("the State"), to file responsive pleadings. Sanofi certifies that the State has consented to the requested extension.

Pursuant to this Court's Order granting Sanofi's previous *Consent Motion for Extension of Time to Plead* (Rec. Doc. 10), the Defendants' responsive pleadings are currently due on or before May 26, 2023. (Rec. Doc. 16.) The State, having since informed the Defendants that it intends to file a motion to remand this action to state court, has agreed to further extend the responsive pleadings deadline for all Defendants until fourteen days after this Court issues a ruling on the State's forthcoming motion to remand. All Defendants also consent to the requested extension.

WHEREFORE, Sanofi respectfully requests that its Second Consent Motion for Extension of Time to Plead be GRANTED, and that all Defendants be allowed an extension of fourteen (14) days after this Court issues a ruling on the State's forthcoming motion to remand to file responsive pleadings.

Respectfully submitted,

IRWIN FRITCHIE URQUHART MOORE & DANIELS LLC

/s/ Shannon M. Kippers

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Counsel for Sanofi-Aventis U.S. LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of May, 2023, the foregoing pleading was electronically filed with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system.

/s/ Shannon M. Kippers

Shannon M. Kippers